

EXHIBIT E



2208 North 30th Street, Suite 202, Tacoma, WA 98403 • 253.627.6401 • Toll Free: 800.649.2034 • byersanderson.com

ONE-WEEK TRANSCRIPT TURNAROUND

Digital Transcripts • Internet Realtime • HD Legal Video • Picture-in-Picture Depositions
Remote Witnesses • Designation Editing • Nationwide Scheduling • HD Videoconferencing

In the Matter of:

NWAUZOR et. al

vs

GEO GROUP

JOSHUA GRICE

December 06, 2019

Thank you for choosing Byers & Anderson for your court reporting, legal video, and videoconferencing needs. For over 35 years it has been our goal to provide you with unmatched service. Our one-week transcript turnaround is an industry leader. If there is anything we can do to assist you, please don't hesitate to let us know.

Sarah Fitzgibbon, CCR
Deposition Services Lead Consultant



The Premier Advantage™
PDF transcript bundle contains:

- Full-size and condensed transcripts
- Printable word index
- Hyperlinked selectable word index
- Embedded printable exhibit scans
- Hyperlinked selectable exhibit viewing
- Common file formats: txt, lef, mdb
accessed via *paperclip* icon

NWAUZOR et. al vs GEO GROUP
Grice, Joshua - December 06, 2019

30(b)(6)

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

NWAUZOR et. al,)	
)	
Plaintiff,)	
)	
vs.)	No.
)	3:17-cv-05769-RJB
THE GEO GROUP, INC.,)	
)	
Defendant.)	

30(b)(6) DEPOSITION OF THE DEPARTMENT OF LABOR & INDUSTRIES
THROUGH JOSHUA GRICE
December 6, 2019
Tumwater, Washington

APPEARANCES

For the Defendant:

Joan Mell
Sophia Spurlock
III Branches Law, PLLC
1019 Regents Boulevard
Suite 204
Fircrest, Washington 98466
253.566.2510
joan@3brancheslaw.com

For the Department of Labor & Industries:

James Mills
Office of the Attorney General
1250 Pacific Avenue
Suite 105
Tacoma, Washington 98401
253.597.3896
james.mills@atg.wa.gov

For the State of Washington:

Marsh Chien
Office of the Attorney General
800 Fifth Avenue
Suite 2000
Seattle, Washington 98104
206.389.3886
marsha.chien@atg.wa.gov

EXAMINATION INDEX

EXAMINATION BY:	PAGE NO.
Ms. Mell	4

EXHIBIT INDEX

EXHIBIT NO.	DESCRIPTION	PAGE NO.
Exhibit No. 340	Letter to Joel Sacks from David Carlson dated 12/15/14	26
Exhibit No. 341	Complaints by Keyword - Detainee, Inmate, Prisoner	33

BE IT REMEMBERED that on Friday,
December 6, 2019, at 7273 Linderson Way Southwest,
Conference Room 117, Tumwater, Washington, at 12:09 p.m.,
before APRIL COOK, CCR, appeared JOSHUA GRICE, the
witness herein;

WHEREUPON, the following proceedings
were had, to wit:

<<<<<< >>>>>>

JOSHUA GRICE, having been first duly sworn
by the Certified Court Reporter,
testified as follows:

EXAMINATION

BY MS. MELL:

Q State your name.

A Josh Grice.

Q What's your title?

**A Employment standards program manager at the Department of
Labor and Industries.**

Q Do you understand what your role is here?

A Yes.

Q What is it?

A I implement the labor protection laws that relate to

1 Q (By Ms. Mell) All right. Has there ever been
2 a determination by L&I that the detainees at the
3 Northwest Detention Center are subject to K?

4 MR. MILLS: Objection as to scope.

5 **THE WITNESS: I'm not aware of**
6 **a determination with regard to detainees at the Northwest**
7 **Detention Center, no.**

8 Q (By Ms. Mell) Okay. It is correct that individuals held
9 at the federal detention facility at SeaTac are not
10 subject to any kind of state oversight, right?

11 MR. MILLS: Objection as to form.

12 Lack of foundation. Outside the scope.

13 **THE WITNESS: Sorry, could you repeat**
14 **your question?**

15 Q (By Ms. Mell) So -- so -- I'm trying to -- let me think.
16 How am I going to ask this?

17 Do you -- do you know whether or not the same
18 applicable Exemption K is the authority for not
19 investigating Wage Act claims by detainees held by the
20 federal government?

21 MR. MILLS: Objection as to form.

22 Speculation. Legal conclusion. Go ahead.

23 **THE WITNESS: I'm not aware of**
24 **Department determinations on detainees held by the**
25 **federal government.**

1 locations where private contractors are using detainee
2 labor to fulfill their state contracts?

3 MR. MILLS: Objection as to form.
4 Foundation. Calls for speculation.

5 **THE WITNESS: The Department's**
6 **enforcement is generally complaint based. The Department**
7 **would analyze the circumstances if a individual submitted**
8 **a complaint from work related to work performed in one of**
9 **those facilities.**

10 Q (By Ms. Mell) And is it still correct that the
11 Department has not received any complaints from any
12 detainees at the Northwest Detention Center?

13 MR. MILLS: Objection as to scope.

14 **THE WITNESS: Yes, I'm not aware of**
15 **any complaints that the Department has received from**
16 **detainees at the Northwest Detention Center.**

17 Q (By Ms. Mell) And the Department's position with regard
18 to the application of the Minimum Wage Act to detainees
19 at the Northwest Detention Center has not changed from
20 the last time I deposed you?

21 MR. MILLS: Objection as to form.
22 Scope.

23 **THE WITNESS: No.**

24 MS. MELL: Okay. I think we're there.
25 Thank you.

1 STATE OF WASHINGTON) I, April Cook, CCR #3245,
2) ss a certified court reporter
3 County of Pierce) in the State of Washington, do
4 hereby certify:

5 That the foregoing deposition of JOSHUA GRICE was taken
6 before me and completed on December 6, 2019, and thereafter
7 was transcribed under my direction; that the deposition is a
8 full, true and complete transcript of the testimony of said
9 witness, including all questions, answers, objections,
10 motions and exceptions;

11 That the witness, before examination, was by me duly
12 sworn to testify the truth, the whole truth, and nothing but
13 the truth, and that the witness reserved the right of
14 signature;

15 That I am not a relative, employee, attorney or counsel
16 of any party to this action or relative or employee of any
17 such attorney or counsel and that I am not financially
18 interested in the said action or the outcome thereof;

19 That I am herewith securely sealing the said deposition
20 and promptly delivering the same to Joan Mell.

21 IN WITNESS WHEREOF, I have hereunto set my signature on
22 the 12th day of December, 2019.

23 

24 April Cook, CCR
25 Certified Court Reporter No. 3245
(Certification expires 10/11/20.)